

November 3, 2015

Taylor Jantz-Sell  
ENERGY STAR® Lighting Program Manger  
1200 Pennsylvania Avenue  
NW MC 6202J  
Washington, DC 20460

**Subject: ENERGY STAR Lamps 2.0 Comments**

Dear Ms. Jantz-Sell:

The electric Sponsors of the Mass Save and Rhode Island residential ENERGY STAR lighting Programs, as named below, would like to voice our opinion as you finalize the fourth draft of the ENERGY STAR Lamps Specification V2.0. We have been closely following the discussions relating to the specification and have some concerns with regards to the omni-directional requirements in particular. **We believe that it would not be in the best interest of consumers, the ENERGY STAR brand and our individual programs to revert back to earlier requirements that would accept a reduced beam spread.**

The common incandescent lamps that consumers are comfortable with provide an illumination pattern in all directions (omni-directional). It is that standard that must be met if LEDs are to replace inefficient incandescent lamps in many common applications. Consumers are easily confused with the multitude of lighting choices in the market. We would not want to add to that confusion by supporting products that fail to perform the way they expect them to.

With LED technology continuing to advance quickly, we believe ENERGY STAR needs to maintain its lead role in the industry by taking actions that drive high standards for performance. As noted in the recent webinar presentation on this subject, the goal of the specification revision is to “Capture improvement in LED lamps”. It does not make sense then to take a step backward and reduce or remove the requirements for omni-directionality that were implemented during the last spec revision.

Sincerely,

Briana Kane, **Cape Light Compact**

Kristen Pomer, **Eversource** (Massachusetts)

Laurie Acone, **National Grid** (Massachusetts and Rhode Island)

Kevin Parse, **Unitil** (Massachusetts)